

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Wireline Competition Bureau Seeks Further	)	WC Docket No. 10-90
Comment on Issues Regarding the Design	)	
Of the Remote Areas Fund	)	

To: Chief, Wireline Competition Bureau

**REPLY COMMENTS OF  
JAB WIRELESS, INC.**

JAB Wireless, Inc. and its subsidiaries (collectively, “JAB”), by counsel and pursuant to Sections 1.415 and 1.419 of the Commission’s Rules, submits these Reply Comments in response to the request of the Wireline Competition Bureau (“Bureau”) for information concerning the “quality of voice service” that wireless Internet service providers (“WISPs”) offer their customers.<sup>1</sup> JAB urges the Commission to allow WISPs to be eligible for support under the Remote Areas Fund (“RAF”) program.

**Introduction<sup>2</sup>**

JAB is a WISP that provides fixed wireless broadband services to approximately 160,000 residential and business customers, making it one of the largest WISPs in the country. JAB operates in 14 states using a variety of spectrum solutions, including the unlicensed 900 MHz, 2.4 GHz and 5 GHz bands, the 3650-3700 MHz “lightly licensed” band and the 2.5 GHz licensed band. In many areas, JAB is the only provider of terrestrial fixed broadband service.

---

<sup>1</sup> Public Notice, *Wireline Competition Bureau Seeks Further Comment on Issues Regarding the Design of the Remote Areas Fund*, DA 13-69 (rel. Jan. 17, 2013) (“*Public Notice*”) at 11.

<sup>2</sup> The statements of fact set forth in these Reply Comments are supported by the attached Declaration of Damon Estep, JAB’s Director of VoIP Operations.

JAB also provides wireless interconnected Voice over IP (“VoIP”) service to approximately 23,600 residential subscribers (15 percent of JAB’s customers) at a cost of \$19.95 per month (in addition to the cost of broadband service). JAB processes over 2.5 million VoIP calls per month totaling 10 million minutes of use. JAB’s average customer uses the VoIP service for 108 calls per month averaging four minutes per call, for a total monthly usage of 432 minutes. Each month, JAB processes an average of 205 E-911 calls. In 2012, JAB and its subsidiaries contributed more than \$500,000 into the Universal Service Fund (“USF”).

JAB designs and provisions its own VoIP service, which it has integrated into numerous WISP systems that it has acquired in the last several years by upgrading the wireless facilities to handle the quality of service that interconnected VoIP service requires. JAB’s systems are able to ensure quality of service for voice calls prioritizing voice traffic over broadband traffic and dedicating additional bandwidth to voice traffic when needed.

### **Discussion**

In the *Public Notice*, the Bureau seeks to “update the record on the quality of voice service that . . . wireless Internet service providers (WISPs) are able to offer today, and over the next twelve months.”<sup>3</sup> In its Comments, the Wireless Internet Service Providers Association (“WISPA”) stated that “WISPs have the ability to deliver VoIP service that is comparable to the quality of VoIP service provided over a wireline infrastructure.”<sup>4</sup> Based on an analysis of its recent VoIP calling history and its understanding and experience in adding quality of service to its wireless system design, JAB confirms the accuracy of WISPA’s statement and urges the Commission to adopt rules that would allow WISPs to obtain RAF support.

---

<sup>3</sup> *Id.*

<sup>4</sup> Comments of the Wireless Internet Service Providers Association, WC Docket No. 10-90 (Feb. 19, 2013) at 3.

JAB reviewed a total of 1,412,175 VoIP calls from February 2013, enough of a sample to yield accurate results. Of these calls, 7,097 failed with a signaling or network error. The failure could have been either in setting up the call or after the call was established. This translates to a normal call completion rate of 99.5 percent, or a failure rate of 1 in 200 calls.

JAB offers a failover feature to its customers which routes inbound calls to an alternative number (such as a mobile phone) in the event of a broadband service outage. This feature requires JAB to monitor the availability of all of its VoIP CPE devices. JAB polls every two minutes when the device was last known to be reachable, and every 20 seconds when a device was last known to be unreachable. This polling data is saved and used for analysis of network performance and VoIP service availability. The data shows that 99 percent of customers experience service availability between 99 and 100 percent of the time, with a majority of recorded unavailability events occurring during broadband network maintenance windows in the very early morning hours.

During 2012, JAB did not receive any complaints related to E911 calls not completing, and received two complaints of E911 calls routed to the wrong Public Safety Access Point. Both instances of incorrect routing were attributable to errors in geo-coding the service address, and not related to JAB's VoIP service itself.

JAB's call completion rate and lack of complaints concerning 911 calls demonstrate that it is providing high-quality interconnected VoIP service to its customers. JAB has successfully deployed its interconnected VoIP service in numerous markets by upgrading the wireless facilities to accommodate the high level of service quality its customers require. JAB believes that any properly designed and managed WISP network would have similar call completion rates.

Based on its analysis of millions of interconnected VoIP calls across numerous unlicensed WISP networks, JAB strongly believes that it provides a high quality of voice service, and that its results are typical of the service quality that other WISPs offer. In addition, as a contributor to USF based on its interconnected VoIP revenues, fairness dictates that JAB should also be eligible to receive benefits from the program where it provides service to unserved areas.

### **Conclusion**

JAB Wireless, Inc. requests that the Commission adopt rules that will enable wireless Internet service providers to obtain support from the Remote Areas Fund program.

Respectfully submitted,

**JAB WIRELESS, INC.**

March 18, 2013

By: /s/ Stephen E. Coran  
Lerman Senter PLLC  
2000 K Street, NW, Suite 600  
Washington, D.C. 20006-1809  
(202) 416-6744  
Its Counsel

### **Declaration of Damon Estep**

My name is Damon Estep and I am the Director of VoIP Operations for JAB Wireless, Inc. I have reviewed the accompanying Reply Comments of JAB Wireless, Inc. I hereby certify under penalty of perjury that the statements of fact set forth in the Reply Comments are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Damon Estep

\_\_\_\_\_  
Date

3/15/2013